

REMARKS

Claims 9-17 are pending. Claims 1-8 have been cancelled. Claims 9-17 have been rejected under 35 U.S.C. §102.

The Examiner has indicated that new corrected drawings are required in this application because there are allegedly too many hand-written unreadable notations on the previously submitted drawings. Applicants herewith submit proper formal drawings under cover of a separate letter to the Official Draftsperson.

Claims 9-17 have been rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,295,556 to Falcon et al. (hereinafter "Falcon "). The rejection is traversed and reconsideration is respectfully requested.

Falcon is directed to a method and system for configuring a computer to connect to different networks. The system is a spatially-expanded network having a base coupling that simplifies the different network connections for the computer. Input received through a user interface is used to identify a network and its associated configuration information, which is then independently saved for each different network by writing the information into a data structure maintained in a non-volatile storage (e.g., by independently storing object class information and parameter data in a file of a file system for each network connection). To connect the computer to a selected network, the configuration information is retrieved from the data structure corresponding to the selected network, and the connection is made by applying the retrieved information and parameter values to the running configuration of the system. A process is also provided to reconcile network components described in the connection object with the network components actually present on the computer system.

Use of the method and system of the Falcon invention facilitates the connection to or configuration of a computer to different networks. This is achieved by making it possible to store data which are necessary for creating a given network connection or configuration in a file and by retrieving that data when the mentioned connection or configuration is to be renewed.

Claim 9 of the present application recites a facility control component of a computer system that controls establishment of a system component of the computer system, comprising means for first taking information from a facility table regarding what communication channel type for the system components is to be established for which system component type, means for determining system components of the

type present in the system, and means for generating facility data with reference to which the system components and the identified system components implement establishment of the channel type.

Claim 13 of the present application recites a facility control component of a computer system that controls establishment of a system component comprising a facility table from which the facility component takes information regarding which communication channel type or types are to be established for which system component type or types.

Claim 14 of the present application recites a facility control component of a computer system that controls the establishment of a system component comprising a facility table according to which the facility component controls establishment of communication channels between the system component to be established and remaining system components. The facility table has a first column that indicates possible types of system components that can be established, a second column that indicates the system component types for which a system component type from the first column can have a communication relationship, and a third column that indicates the type of communication channel that is to be established between the system component types of the first and second column.

Claim 15 of the present application recites a method for controlling establishment of communication channels for a system component of a computer system. The method comprises taking from a facility table information regarding which communication channel type is to be established for the system component for which system component type; identifying the system components of the type existing in the current system; and generating establishment data on the basis of the channel type, the system component, and the identified system components, thereby implementing establishment of the channel type with reference thereto.

Claim 16 of the present application recites a method for generating a facility table with assistance of which establishment of communication channels between system components of a computer system is controlled. In the method, a static declaration of a type of networking of system components wherein a declaration is made as to what system component type is to be established and which communication channel type or types are to be established for which system component type is implemented at a design time. Also, a facility table based on the static declaration is produced at a system building time.

Falcon fails to disclose, teach, or suggest means for taking information from a facility table regarding what communication channel type for the system components is to be established for which system component type, as is recited in claim 9. Because a permanent communication channel is established in the present invention with the help of a statistical table, an increase in the flexible networking (e.g., the taking of information regarding what channel type is related to which system component) across system processors is achieved. The Falcon invention does not teach such establishment of a permanent communication channel, but instead retrieves configuration information from a *selected* data structure. By selecting the data structure, intermittent communication is established. Intermittent communication is not permanent communication, which is indicative of the present invention and which is established by the flexible networking that derives from the use of means for taking information regarding channel- and system component type from a facility table. Thus, means for taking information regarding channel- and system component type from a facility table, as is recited in claim 9, is patently distinct from the retrieval of configuration information from a selected data structure, as is disclosed in Falcon.

Falcon further fails to disclose, teach, or suggest a facility control component of a computer system that controls the establishment of a system component comprising a facility table from which the facility component takes information regarding which communication channel or type or types are to be established for which system component type or types, as is recited in claim 13. Also, Falcon fails to disclose, teach, or suggest a facility control component that controls the establishment of communication channels between system components, as is recited in claim 14. A facility table from which the facility component takes information regarding communication channel type is not, as is suggested by the Examiner, a connections folder (shown at 96 in the Falcon patent). The facility table, as is recited in claims 13 and 14, allows for the transfer of information regarding communication channel type and the control of the establishment of communication channels, respectively. In either recitation, the facility table is not, as in Falcon, simply a display of the set of connection objects and their associated details (Falcon, col. 6, lines 32-36). Thus, the facility table of the present invention is patentably distinct from the connection folder of Falcon.

Falcon still further fails to disclose, teach, or suggest taking information regarding communication channel type from a facility table, as is recited in claim 15.

As stated above with regard to claim 9, a permanent communication channel is established through the facility table, and flexible networking to and from the table is established. The Falcon invention does not teach such establishment of a permanent communication channel, but instead retrieves configuration information from a *selected* data structure from which intermittent communication is established (the intermittent communication not being permanent communication). Thus, taking information regarding communication channel type from a facility table, as is recited in claim 15, is patently distinct from retrieving configuration information from a selected data structure, as is disclosed in Falcon.

Falcon still further fails to disclose, teach, or suggest implementing a static declaration of a type of networking of system components, as is recited in claim 16. In particular, Falcon specifically states that his invention “replace[s] the static network configuration” (Falcon, col. 1, lines 55-57, and col. 10, lines 14-16). A method that implements a static declaration, as is recited in claim 16, is the opposite of a method in which a static network is replaced. Thus, a method that implements a static declaration, as is claimed, is patentably distinct from the method as taught by Falcon.

To anticipate a claim under 35 U.S.C. §102, a single reference must disclose each and every element of the claimed invention. *Lewmar Marine v. Barient Inc.*, 3 USPQ2d 1766 (Fed. Cir. 1987). Absence from the reference of any claimed element negates anticipation. *Kloster Speedsteel AB v. Crucible Inc.*, 793 F.2d 1565 (Fed. Cir. 1986). Because Falcon fails to disclose, teach, or suggest means for taking information from a facility table regarding what communication channel type for the system components is to be established for which system component type, as is recited in claim 9, or taking information regarding communication channel type from a facility table, as is recited in claim 15, claims 9 and 15 are not anticipated by the Falcon reference. Furthermore, because Falcon fails to disclose, teach, or suggest a facility table, as is recited in claims 13 and 14, claims 13 and 14 are not anticipated by the Falcon reference. Still further, because Falcon fails to disclose, teach, or suggest implementing a static declaration of a type of networking of system components, as is recited in claim 16, claim 16 is not anticipated by the Falcon reference. For at least these reasons, claims 9 and 13-15 are allowable.

Dependent claims, by definition, further define the subject matter of the independent claims from which they depend. Because claims 10-12 depend from claim 9, and because claim 9 is believed to be allowable for at least the reasons


presented above, claims 10-12, because they add limitations that further define the subject matter of independent claim 9, are allowable. Furthermore, because claim 17 depends from claim 16, and because claim 16 is believed to be allowable for at least the reasons presented above, claim 17, because it adds limitations that further define the subject matter of independent claim 16, is allowable.

Applicants believe that the foregoing is fully responsive to the Office Action and that the claims herein are allowable to Applicants. In view of the foregoing points that distinguish Applicants' invention from those of the prior art and render Applicants' invention novel, Applicants respectfully request that the Examiner reconsider the present application, remove the rejections, and allow the application to issue.

If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is invited to telephone the undersigned.

Applicants believe that no fees are due with respect to the submission of this Response. If, however, it is deemed that any fees are incurred with respect to this Response, they may be charged to Deposit Account No. 13-0235 maintained by Applicants' attorneys.

Respectfully submitted,

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